



County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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July 31, 2013

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From: Philip L. Browning
Director

**SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY CONTRACT COMPLIANCE
MONITORING REVIEW**

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a review of Southern California Foster Family Agency (The FFA) in January 2013. The FFA has one licensed office, in the First Supervisorial District, and provides services to County of Los Angeles DCFS foster children and youth. According to the FFA's program statement, its mission is "to provide foster and adoptive families who offer stable, secure and nurturing environments to children who are dependents of the Court until they are reunited with their birth families, are adopted or become independent."

At the time of the review, the FFA supervised 67 DCFS placed children in 42 certified foster homes. The placed children's average length of placement was 11 months, and their average age was seven.

SUMMARY

During OHCMD's review, the interviewed children generally reported: feeling safe at the FFA; having been provided with good care and appropriate services; being comfortable in their environment and treated with respect and dignity. The certified foster parents reported they were supported by the FFA staff in their efforts to provide care, supervision and service delivery to the children placed in their homes.

The FFA was in full compliance with six of the 11 sections of our program compliance review: Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; Discharged Children; and Personnel Records.

"To Enrich Lives Through Effective and Caring Services"

OHCMD noted deficiencies in the area of: Licensure/Contract Requirements, related to one substantiated Community Care Licensing (CCL) citation finding; Certified Foster Homes, related to failure to submit an inquiry to the OHCMD monitor for historical abuse/neglect information prior to certification for three certified foster homes, health screenings were untimely for one certified foster home, there was no verification of the required pre-certification training on file for two certified foster parents, and there was no car insurance for one certified foster parent; Facility and Environment, related to the exterior grounds of a foster home, which was not well maintained and the children's bedroom was cluttered with the certified foster parent's personal items; Maintenance of Required Documentation and Service Delivery, related to a Needs and Services Plan (NSP) not being comprehensive and goals were not noted in the NSP; and Education and Workforce Readiness, related to one child not having been enrolled in school within three school days of placement.

Attached are the details of our review.

REVIEW OF REPORT

On February 1, 2013, the DCFS OHCMD Monitor, Cori Shaffer, conducted an Exit Conference with the FFA representatives, Sylvia Fogelman, Executive Director and Kimberly Sutton, FFA Supervising Social Worker. The FFA's representatives: agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve their compliance with regulatory standards; and agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

A copy of this compliance report has been sent to the Auditor-Controller and CCL.

The FFA provided the attached approved CAP addressing the recommendations noted in this compliance report.

OHCMD will confirm that these recommendations have been implemented during our next monitoring review.

If you have any questions, your staff may contact me or Aldo Marin, Board Relations Manager, at (213) 351-5530.

PLB:EM:KR
RDS:Nf:cs

Attachments

c: William T Fujioka, Chief Executive Officer
Wendy Watanabe, Auditor-Controller
Public Information Office
Audit Committee
Sylvia Fogelman, President and CEO, Southern California FFA
Angelica Lopez, Acting Regional Manager, Community Care Licensing

**SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW
FISCAL YEAR 2012-2013**

SCOPE OF REVIEW

The following report is based on a "point in time" monitoring visit. This compliance report addresses findings noted during the January 2013 review. The purpose of this review was to assess Southern California Foster Family Agency (the FFA's) compliance with the County contract and State regulations and included a review of the FFA's program statement, as well as administrative internal policies and procedures. The monitoring review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- Facility and Environment,
- Maintenance of Required Documentation and Service Delivery,
- Educational and Workforce Readiness,
- Health and Medical Needs,
- Psychotropic Medication,
- Personal Rights and Social Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children, and
- Personnel Records.

For purposes of this review, 11 children were selected for the sample. Out-of-Home Care Management Division (OHCMD) interviewed each child and reviewed their case files to assess the care and services they received. Additionally, five discharged children's files were also reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, three placed children were prescribed psychotropic medication. We reviewed their case files to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

OHCMD reviewed seven certified foster parent files and two staff files were reviewed for compliance with Title 22 Regulations and County contract requirements. Interviews were conducted with seven certified foster parents to assess the quality of care and supervision provided to children.

CONTRACTUAL COMPLIANCE

OHCMD found the following five areas to be out of compliance.

Licensure/Contract Requirements

Community Care Licensing (CCL) cited the FFA for general neglect and lack of supervision. During a visit to a certified foster home CCL learned that a child had been left unattended at home on the bed, the child rolled off the bed and fractured a leg. The FFA decertified the

certified foster home due to the CCL substantiated general neglect allegation and OHCMD placed the home on an "Indefinite Hold" status.

Recommendations

The FFA's management shall ensure that:

1. All certified foster parent homes remain in compliance with Title 22 Regulations and documentation is maintained in the certified foster parent files.

Certified Foster Homes

- For three of the certified foster homes in the sample, OHCMD did not find documentation in the foster parent files that the FFA staff submitted inquiries to the OHCMD monitor for historical abuse/neglect information prior to certification of each of the homes. During the review, OHCMD completed a historical abuse/neglect search for the three certified foster families and determined that there was nothing to preclude the prospective foster parents from being placement resources. During the exit interview the FFA administrative staff stated that they have developed a new procedure at certification to ensure timeliness of OHCMD reference checks.
- For one certified foster home, the foster parent's health screenings were untimely by 15 months. During the review the FFA required the certified foster parents to obtain current health screens and TB tests and to provide documentation to the FFA. During the exit interview the FFA administrator indicated that since the family transferred from an FFA that was suspending its FFA program, it took some time to be certain that all documentation was up to date. In the future they will ensure that newly certified and foster parents transferring receive timely health screenings and TB tests.
- OHCMD noted that for two certified foster homes transferring from another FFA, there was no verification of the required pre-certification training on file. During the exit interview the FFA administrative staff stated that the certified foster parents' home studies from their prior FFA noted that precertification training for the two families was completed however; the new FFA was unable to obtain the actual certificates from the previous FFA. During the exit interview the FFA administrative staff indicated that in the future, they will require that verification of all trainings will be obtained prior to completing the transferring of certified foster homes.
- For one certified foster parent, the car insurance provided to the FFA was not in her name. During the exit interview the FFA administrative staff obtained written verification that the foster mother is an approved driver on the car insurance. During the exit interview the FFA administrative staff indicated that in the future they will ensure that all certified foster parent's names are listed on their car insurance either as a primary or approved driver and that documentation is maintained in the files.

Recommendations

The FFA's management shall ensure that:

2. Prior to certification of a foster home, the FFA will submit an inquiry to OHCMD for historical information of abuse/neglect and documentation will be maintained in the files.
3. All certified foster parents have timely health screenings and TB tests required by Title 22 regulations and that documentation is maintained in the files.
4. All certified foster parents complete the required initial training and documentation is maintained in the files.
5. All certified foster parents have the required current car insurance in their name on file with the FFA and ongoing documentation is maintained.

Facility and Environment

- During a visit to one of the certified foster homes, OHCMD noted that the backyard was cluttered with debris. The FFA supervisor was immediately notified and the FFA social worker responded to the certified foster home to ensure that the yard was cleaned and safe for the children to play. Photos were provided to OHCMD prior to the completion of the review to verify that corrections were made. As an additional measure of compliance, the FFA will provide two additional home inspections during the year.
- For the same home, OHCMD noted that the two siblings shared a bedroom that was cluttered with foster mother's personal items in the corners of the room and in the drawers which made it difficult to determine if the children had the required amount of clothing. During the review, this was immediately brought to the FFA's attention and the FFA social worker responded to the foster home, assisted foster mother in organizing and storing her personal items out of the foster children's designated space and provided verification of the corrections made. During the exit conference the FFA administrator indicated that the FFA provided additional training to the foster parent and to the FFA staff.

Recommendations

The FFA's management shall ensure that:

6. The grounds and exteriors of all certified foster homes are well maintained and the FFA staff routinely inspects and monitors the homes for ongoing compliance and documentation is maintained in the files.
7. All placed children's bedrooms are well-maintained, the FFA staff routinely inspects and monitors the home to ensure ongoing compliance and documentation is maintained in the files.

Maintenance of Required Documentation and Service Delivery

- One five year old placed child had no educational goals noted in his Needs and Services Plans (NSP). During the exit conference the FFA representative indicated that the child's NSP was sufficiently detailed with the exception of his educational goal.
- For this same child, the NSP was not comprehensive. During the exit conference the FFA administrator noted that at the end of 30 days, the NSP was detailed despite the omission of educational goals.

It should be noted that the FFA's representatives attended the OHCMD's NSP training for providers on January 23, 2012.

Recommendations

The FFA's management shall ensure that:

8. The FFA staff documents the specific goals of the children in the NSPs and such documentation is maintained in the child's file.
9. Timely, comprehensive NSPs are completed by the FFA social worker and documentation is maintained in the children's files.

Education and Workforce Readiness

OHCMD noted that one five year old child placed with the FFA was not enrolled in school within three school days of placement. OHCMD did not find any documentation of efforts to enroll the child in school within the required timeframe. During the exit conference the FFA administrator indicated that this was an exceptional situation whereby the child was detained following the death of his mother, had never attended school before and the FFA staff made the decision to delay school enrollment to allow the child to grieve in the home with his foster mother.

Recommendation

The FFA's management shall ensure that:

10. All age-appropriate placed children are enrolled in school within three days, any exceptions are to be discussed with the DCFS case-carrying Children's Social Worker and that documentation is maintained in the file.

PRIOR YEAR FOLLOW-UP FROM DCFS OHCMD's FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The OHCMD's last compliance report dated June 22, 2012 identified four recommendations.

Results

Based on our follow-up, the FFA fully implemented all four previous recommendations for which they were to ensure that:

1. All additional caregivers have current CPR, First-Aid certificates, California Driver's Licenses and car insurance and the FFA provide ongoing monitoring and documentation.
2. All certified foster homes are in compliance with Title 22 regulations with regard to children's sleeping arrangements and that the FFA social work staff routinely inspects the home for compliance.
3. Placed children's academic progress and educational services are routinely monitored by FFA staff and documentation is maintained.
4. Documentation of reports and on-going communication is maintained in the children's files.

MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER (A-C)

A fiscal review of the FFA has not been posted by the A-C.

**SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY
CONTRACT PROGRAM COMPLIANCE MONITORING REVIEW-SUMMARY**

155 North Occidental Blvd. Los Angeles, CA 90026 License: 191500291

	Contract Compliance Monitoring Review	Findings: January 2013
I	<p><u>Licensure/Contract Requirements</u> (7 Elements)</p> <ol style="list-style-type: none"> 1. Timely Notification for Child's Relocation 2. Serious Incident Report Documentation and Cross Reporting 3. Runaway Procedures 4. Are there CCL Citations/OHCMD Safety Reports 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA Pays Certified Foster Parents Whole Foster Family Home Payments 7. Assessment of Certified Foster Parent (CFP) Prior to Placement of Two (2) or More Children 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Improvement Needed 5. Not Applicable 6. Full Compliance 7. Full Compliance
II	<p><u>Certified Foster Homes (CFHs)</u> (12 Elements)</p> <ol style="list-style-type: none"> 1. Home Study and Safety Inspection Prior to Certification 2. Contact with References/Including Check with OHCMD 3. Timely DOJ, FBI, CACI 4. Timely, Completed, Signed Criminal Background Statement 5. Health Screening & TB Test Prior to Certification 6. Required Training Prior to Certification 7. Certificate of Approval on File/Including Capacity 8. Safety Inspection Every Six Months or Per Approved Program Statement 9. Completed Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates 10. Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers 11. Other Adults in the Home: Health Screening/CDL/CPR DOJ/FBI/CACI/Auto Insurance 12. FFA Assists CFPs with Transportation Needs 	<ol style="list-style-type: none"> 1. Full Compliance 2. Improvement Needed 3. Full Compliance 4. Full Compliance 5. Improvement Needed 6. Improvement Needed 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Improvement Needed 11. Full Compliance 12. Full Compliance
III	<p><u>Facility and Environment</u> (7 Elements)</p> <ol style="list-style-type: none"> 1. Exterior/Grounds Well Maintained 2. Common Areas Maintained 3. Children's Bedrooms/Interior Maintained 	<ol style="list-style-type: none"> 1. Improvement Needed 2. Improvement Needed 3. Full Compliance

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	<ol style="list-style-type: none"> 4. Sufficient Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. Disaster Drills Conducted and Documentation Maintained 7. Allowance Logs Maintained 	<ol style="list-style-type: none"> 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance
IV	<p><u>Maintenance of Required Documentation/Service Delivery</u> (10 Elements)</p> <ol style="list-style-type: none"> 1. Department of Children and Family Services (DCFS) Children's Social Worker's (CSW) Authorization to Implement NSPs 2. NSPs Implemented and Discussed with CFPs 3. Children Progressing Towards Meeting NSP Goals 4. Develop Timely, Comprehensive Initial NSP with Child's Participation 5. Develop Timely, Comprehensive Updated NSPs with Child's Participation 6. Therapeutic Services Received 7. Recommended Assessments/Evaluations Implemented 8. DCFS CSW's Monthly Contacts Documented in Child's Case File 9. Develop Timely, Comprehensive Quarterly Reports 10. FFA Social Workers Conduct Required Visits 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Improvement Needed 4. Improvement Needed 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance
V	<p><u>Education and Workforce Readiness</u> (5 Elements)</p> <ol style="list-style-type: none"> 1. Children Enrolled in School within Three School Days 2. Children Attend School as Required and FFA Facilitates Children's Educational Goals Met 3. Children's Academic Performance and/or Attendance Increased 4. Current Report Cards Maintained 5. FFA Facilitates Child's Participation in YDS/Equivalent/Vocational Programs 	<ol style="list-style-type: none"> 1. Improvement Needed 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance
VI	<p><u>Health and Medical Needs</u> (4 Elements)</p> <ol style="list-style-type: none"> 1. Initial Medical Exams Conducted Timely 2. Follow-up Medical Exams Conducted Timely 3. Initial Dental Exams Conducted Timely 4. Follow-Up Dental Exams Conducted Timely 	Full Compliance (ALL)
VII	<p><u>Psychotropic Medication</u> (2 Elements)</p> <ol style="list-style-type: none"> 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review 	Full Compliance (ALL)

VIII	<u>Personal Rights and Social Emotional Well-Being</u> (10 Elements) <ol style="list-style-type: none"> 1. Children Informed of Agency's Policies and Procedures 2. Children Feel Safe 3. CFPs' Efforts to Provide Meals and Snacks 4. CFPs Treat Children with Respect and Dignity 5. Children Allowed Private Visits, Calls and to Receive Correspondence 6. Children Free to Attend or Not Attend Religious Services/Activities 7. Reasonable Chores 8. Children Informed About Their Medication and Right to Refuse Medication 9. Children Aware of Right to Refuse Medical, Dental and Psychiatric Care 10. Children Given Opportunities to Participate in Extra-Curricular Activities, Enrichment and Social Activities 	Full Compliance (ALL)
IX	<u>Personal Needs/Survival and Economic Well-Being</u> (7 Elements) <ol style="list-style-type: none"> 1. Clothing Allowance in Accordance with FFA Program Statement (\$50 Minimum if After November 1, 2012) 2. Ongoing Clothing Inventories of Adequate Quantity and Quality 3. Children's Involvement in Selection of Clothing 4. Provision of Sufficient Supply of Clean Towels and Personal Care Items Meeting Ethnic Needs 5. Minimum Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement/Assistance with Life Book 	Full Compliance (ALL)
X	<u>Discharged Children</u> (3 Elements) <ol style="list-style-type: none"> 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable) 	Full Compliance (ALL)

XI	<u>Personnel Records</u> (9 Elements) 1. DOJ, FBI, CACI Submitted Timely 2. Timely, Completed, Signed Criminal Background Statement 3. Education/Experience Requirements 4. Employee Health Screening/TB Timely 5. Valid CDL and Auto Insurance 6. Signed Copies of FFA Policies and Procedures 7. Staff Completed All Required Training and Documentation Maintained 8. FFA Social Workers Have Appropriate Caseload Ratio 9. Written Declarations for Contract FFA Social Workers That Caseloads Not Exceed Total of 15 Children	Full Compliance (ALL)
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*Envisioning a Family
for Every Child*

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SOUTHERN CALIFORNIA FOSTER FAMILY & ADOPTION AGENCY 2012/2013 Compliance Review Corrective Action Plan (CAP)

In response to your written request dated 3-5-13, Southern California Foster Family and Adoption Services (SCFFAA) submits the following CAP for the 2012/2013 Compliance Review.

1. There was one substantiated complaint for 2012.

This family was decertified as a result of founded allegations for general neglect, effective 5-31-12.

During staff and foster parent training, we emphasize child safety and the importance of not leaving children on a bed unattended.

2. The FFA staff did not contact the OHCMD for historical information prior to certification of the home for three certified foster homes.

- a. The circumstances for not having the required OHCMD check in place prior to certification for the three foster families was as follows:

- i. One family was certified in 2010, prior to the mandate to obtain an OHCMD check was in place.
- ii. One family had been previously certified with SCFFAA, and had a brief lapse in certification. SCFFAA had maintained subsequent arrest notification for this family and received no notice of arrest/criminal activity.
- iii. For one family, the required OHCMD check occurred 3 days after certification. This family also had a lapse in certification, during which time SCFFAA maintained subsequent arrest notification and received no notice of arrest/criminal activity.

- b. SCFFAA has developed a procedure in which each family completes a form during pre-certification training so that our Social Work staff may submit the necessary request to OHCMD. The evidence of this request and corresponding response is maintained at the agency.

3. For one foster home, we did not find timely health screens or TB tests.

- a. This family's certification was transferred from Vista Del Mar to SCFFAA, when Vista Del Mar discontinued its FFA program. The family's FFA certification was transferred in its entirety, including the health screen

**SOUTHERN CALIFORNIA FOSTER FAMILY & ADOPTION AGENCY
2012-2013 COMPLIANCE REVIEW RESPONSE continued**

which had been completed 1 year and 1 month prior to the time SCFFAA certified the family.

- b. During the review process, both certified foster parents obtained new health screens and TB tests. Now, SCFFAA makes certain that for new and transferring applicants, all required health screens/TB tests are completed within the required time frames, and that documentation of such health screens/TB tests are maintained in the certified parent's file.
4. For two certified foster homes that transferred to SCFFAA from another agency, verification of the required pre-certification training (MAPP or equivalent training) was not found.

For these two families, SCFFAA had pre-certification training documented in the family's Vista Del Mar home studies. During the review process, a letter was obtained from Vista Del Mar, verifying that the families had completed the required training prior to certification. This was an exception to our agency's usual requirement that MAPP training or its equivalent be given by SCFFAA prior to certification. Now, SCFFAA requires that all transferring families, provide written verification of pre-certification training which will be maintained in the certified parent's file.

5. For one certified foster parent there was no car insurance in her name, nor was she noted as an approved driver on the car insurance provided to your agency and there was no verification of annual vehicle inspection on file.
- a. The certified parent had provided insurance for her vehicle; however the file was missing verification that she was an approved driver. During the review process, SCFFAA obtained verification that the foster parent is an insured driver. According to our records, annual car inspections were completed on 3-10-11 and 2-15-12. Therefore, the finding regarding the missing annual vehicle inspection is in error.
 - b. Now, SCFFAA warrants that all certified foster parents have verification that they are approved drivers when the auto insurance is in another individual's name.
6. For one certified foster home it was noted that there was some clutter and trash in the backyard which was accessible to the young children placed in the home and which needed to be discarded.

During the review process, this foster parent removed the items identified as clutter by OHCMC. The Foster Care Supervisor conducted a home visit to verify that the items were properly removed. Training was provided to this foster parent as well as reinforced with agency

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**SOUTHERN CALIFORNIA FOSTER FAMILY & ADOPTION AGENCY
2012-2013 COMPLIANCE REVIEW RESPONSE continued**

staff regarding Title XXII requirements. SCFFAA conducts home inspections prior to certification/recertification, as well as twice per calendar year. For this family, two additional home inspections per calendar year will be conducted to be certain Title XXII standards are maintained.

7. For the same foster home, the childrens' bedroom was not well organized and had some of the certified foster parent's belongings.

During the review process, SCFFAA directed this foster parent to remove personal items from the childrens' bedroom. The Foster Care Supervisor conducted a home visit to verify that the items were removed. Training was provided to this foster parent and reinforced with agency staff regarding Title XXII requirements. SCFFAA conducts home inspections prior to certification/recertification, as well as twice per calendar year. For this family, two additional home inspections per calendar year will be conducted to be certain that Title XXII standards are maintained.

SCFFAA always has enrolled children within 3 days of placement, this was an exception. In the future, the agency will consult with DCFS when we feel that an exception to the school enrollment requirement is warranted.

8. For one child we did not find a detailed NSP and were unable to determine if the child was progressing towards meeting the NSP goals.

This was a 30 day NSP which was sufficiently detailed with the exception of information about the 5 year old child's school enrollment. This was an exceptional situation, as this child was placed into foster care after being with his mother in the hospital when she died. He had never attended school before, and the agency felt as though he needed emotional support from the foster mother, and needed to be with his younger brother. During the review process, SCFFAA completed an addendum to this initial NSP, and submitted the addendum to the CSW. SCFFAA will include educational information on all school aged children.

9. For the same child, the FFA social worker did not develop a comprehensive NSP for the child as there was no educational information for the child noted on the NSP.

In this case, the 5 year old child's NSP was sufficiently detailed with the exception of information about the child's school enrollment. This was an exceptional situation, as this child was placed into foster care after being with his mother in the hospital when she died. He had never attended school before, and the agency felt as though he needed emotional support from the foster mother, and needed to be with his younger brother. During the review process, SCFFAA completed an

March 21, 2013

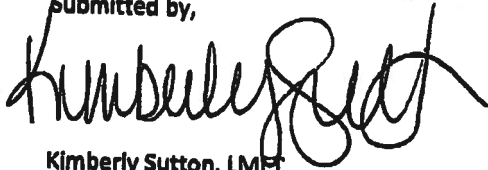
**SOUTHERN CALIFORNIA FOSTER FAMILY & ADOPTION AGENCY
2012-2013 COMPLIANCE REVIEW RESPONSE continued**

addendum to this initial NSP, and submitted the addendum to the CSW. SCFFAA will include educational information on all school aged children.

10. One five year old child was not enrolled in school in a timely manner, and there was no ongoing documentation of efforts to enroll the child in school within the required timeframe.

See above. Under normal circumstances, children are enrolled within the three day mandatory requirement.

Submitted by,

A handwritten signature in black ink, appearing to read 'Kimberly Sutton', written over a horizontal line.

Kimberly Sutton, LMP
Foster Care Supervisor
Southern California Foster Family and Adoption Agency

March 21, 2013

March 21, 2013